

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO (SAN JUAN)
CASE NO.: 18-cr-00746-PAD

UNITED STATES OF AMERICA,

Plaintiff,

-V.S.-

CESAR EMILIO PERALTA-ADAMEZ,

Defendant.

JOINT MOTION TO CONTINUE STATUS HEARING

Defendant Cesar Emilio Peralta -Adamez (“Mr. Peralta”), by and through the undersigned attorney respectfully moves this court for the entry of an Order continuing the Status Hearing currently scheduled for Friday July 22, 2022 at 10:30 am. In support thereof Defendant states:

1. Pursuant to an agreement the parties are waiting for the execution of a Consent to Transfer Case No. 17-CR-20412- DMM to the District of Puerto Rico.
2. Pursuant to Rule 20 of the Federal Rules of Criminal Procedure, upon the transfer of the case, a new case number will be generated to be joined with the pending case in the District of Puerto Rico.
3. Once the new case is assigned to this Court, Defendant intends plead guilty and be sentenced in SDFL 17-CR-20412 in the District of Puerto Rico.
4. The parties anticipate that this process will take approximately an additional thirty (30) days.

5. The undersigned discussed this request with AUSA Max Perez, who agrees that the Status Hearing should be delayed permitting the transfer and consolidation of the pending criminal cases.

WHEREFORE, Defendant respectfully prays for the entry of an Order re-setting the Status Hearing during the week commencing on August 29, 2022.

Dated at San Juan this 21 Day of July, 2022.

Respectfully submitted,

/s/ Joaquin Perez

JOAQUIN PEREZ, ESQ.
Counsel for Defendant
6780 Coral Way
Miami, Florida 33155
Tel: (305) 261-4000 Ext. 3703
FL Bar: 335339
jplaw1@bellsouth.net

/s/ Michael R. Hasse, Esq

Michael R. Hasse, ESQ
USDCPR # 215307
Counsel for Defendant
1302 Avenida Ashford #1503
San Juan, PR 00907
Tel: (860) 444-2711
hasselaw@yahoo.com
noculpable@gmail.com

CERTIFICATE OF SERVICE

I hereby certify that on July 21, 2022, a copy of the foregoing was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system, or by mail to anyone unable to accept electronic filing, as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System

/s/ Michael R. Hasse, Esq

Michael R. Hasse, ESQ
USDCPR # 215307
Counsel for Defendant
1302 Avenida Ashford #1503
San Juan, PR 00907
Tel: (860) 444-2711
hasselaw@yahoo.com
noculpable@gmail.com